Wiley, Rein & Fielding

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Fax: (202) 719-7049 www.wrf.com

November 17, 1999

Federal Communications Commission 1270 Fairfield Road Gettsyburg, PA 17325-7245

Re: FCC Form 602 for Cirrus Communications, Ltd.

Dear Sir or Madam:

Please find enclosed an ownership disclosure filing on Form 602 for Cirrus Communications, Ltd. ("Cirrus"). Cirrus currently is an LMDS license and is filing this disclosure in anticipation of shortly filing an application for consent to assignment of additional LMDS authorizations.

Please direct any questions or correspondence concerning this filing to the undersigned.

Respectfully submitted,

Eric W. DeSilva

Enclosures 3 - h

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FCC 602 Mein Form

Section 503).

FCC Ownership Disclosure Information for the Wireless Telecommunications Servicer

Approved by OMB 3060 - 0799 See instructions for public burden estimate

|) First Name (fi Individual): | MI | Last Name | | Suffix: |
|---|-----------------|-------------------------|-------------------------------------|--|
| Applicant Name (If entity): | | | 3) Applicant TIN: | |
| | | | ľ | |
| irrus Communications, Ltd. | | | | |
| ated $	extsf{FCC}$ Regulated Businesses of Applicant/Lic | ensee | | | |
| 4a) Name and address of all FCC Regulated Businesses owned by Applicant/Licensee (use additional sheets, if necessary): | Pf | 4b) incipal Business | 4c) TIN: | 4d) Percent of Imerest Held: |
| /a | | | | |
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| gnature | | | | |
| yped or Printed Name of Party Authorized to Sign rist Name: | MI: | Last Name: | 1318161778793 | Suffix: |
| (ingdon | R | Hughes | | |
| eresident of ViaCorp, Inc., Ge | newal (| partner | 101.68 NO. 1399 OF OF OR 1274 | |
| ignature: A AUGA | BL. | ur orace | Carried Mills State Company | : -16-99 |
| allure To Sign This Application May Result in Dismissar Of The Appli | cation And Fort | eiture Of Any Fees Pai | d | |
| Fallure To Sign This Application May Result in Dismissary Of The Application May Result in Dismissary Of The Application of ANY ATT AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCT | TACUMENTS A | DE DI INICHARI E RY | FINE AND/OR IMPRISONMENT (U.S. Code | , Tide 18, Section 10 (U.S. Code, Tifle 47, |

FCC Ownership Disclosure Information for the Wireless Telecommunications Services

Approved by OMB 3060-0799 See instructions for public burden estimate

Schedule for Disclosable interest Holders

| Disc&able Interest Holder's First Name (if ind | ividual): | MI: | Last Nan-e: | | Suffix: |
|---|----------------|--------------------|--|---|----------------------------------|
| 2) Disclosable Interest Holder's Name (if entity) : | | <u> </u> | | 3) Disclosable Interest Holder's | TIN: |
| ViaCorp, Inc. | | | | | |
| 4) Disclosable Interest Hdder's Address: | | | | | |
| 2201 N. Central Expressv | vay, Suit | e 115 | , Richardson, | TX 75080-2817 | |
| 5) Type of Interest in Applicant () (refer to Instructions for list) | | | older is a(n): () or list of codes): | 7) Percent of Interest Held in A | pplicant: |
| D . | С | | | 1 | |
| Disc&able Interest Holder's Type of Ownersh (refer to instructions for list): | ip | | 9) Disclosable Interest H | Idder's Country of Citizenship: | |
| G | | | USA | | |
| 0) Relationship Description (if the discloseable in Corporate General Partne | | indirect ow | ner , list path of ownership f | rom indirect owner to the applican | t): |
| elated FCC Regulated Businesses of Di | sclosable Inte | rest Hold | lers (repeat for each i | nterest holder identified) | |
| IIa) Name and address of all FCC Regulated Bus owned by Disclosable Interest Holder listed in additional sheets, if necessary): | | Pr | IIb) incipal Business: | IIc) TIN: | IId) Percent o Interest He |
| Cirrus Communications, L | td. | | | | |
| | I | MDS | | | 1 |
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FCC Ownership Disclosure information for the Wireless Telecommunications Services

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Schedule for Disclosable interest Holders

Disclosable interest Holder information (complete as many as required to describe all disclosable interest holders)

| Disclosable Interest Hdder's First Name (if individual): | | MI: | Last Name: | | Suffix: |
|---|---|-----|----------------------------|---------------------------------------|---------|
| Kingdon | | R | Hughes | | |
| 2) Disclosable Interest Hdder's Name (if entity): | | | | 3) Disc&able Interest Holder's TIN: | |
| | | | | | |
| 4) Disclosable Interest Holder's Address: | | | | | |
| 2201 N. Central Expressway, Suite 115, Richardson, | | | | TX 75080-2817 | |
| 5) Type of Interest in Applicant () (refer to Instructions for list) | Disclosable Interest Holder is a(n): ((refer to instructions for list of codes): | | | 7) Percent of Interest Held in Applic | ant: |
| D, I | I | | | 60 | |
| Disclosable Interest Holder's Type of Ownership (refer to instructions for list): | | | 9) Disclosable Interest Ho | older's Country of Citizenship: | |
| (, | | | | | |
| G, L USA | | | USA | | |
| Mr. Hughes holds a direct | | | | | |
| applicant as well as a 1% | | | | | p of |
| ViaCorp, Inc., the applic | | | _ | | - |
| | | | | | |

Related FCC Reaulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

| IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): | IIb) Principal Business: | IIc) TIN: | IId) Percent of Interest Held: |
|---|-----------------------------|--------------|--------------------------------|
| Cirrus Communications, Ltd. | | | |
| | LMDS | | 60 |
| Personal interest | | | |
| (Kingdon Hughes as licensee) | IVDS | , | 100 |
| Rush Network Corp. | | | |
| | 220 MHz | | 100 |
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FCC Ownership Disclosure Information for the Wireless Telecommunications Services

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Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

| 1) Disclosable Interest kidder's First Name (if individ | dual): | MI: | Last Name: | | Suffix. |
|--|----------------------|-----------------------|---------------------------|------------------------------------|-----------------|
| | | | E | | 1 |
| 2) Disclosable Interest Hdder's Name (if entity): | | <u>_1.</u> | | 3) Disc&able Interest Holder's | TIN: |
| Severn LMDS LLC | | | | | |
| 4) Disclosable Interest Holder's Address: | | | | West Communities | |
| 705 Melvin Avenue, Suite | 202 | \[\]\nnanol | is, MD 21401 | | |
| 5) Type of Interest in Applicant () | | | older is a(n): (| 7) Percent of Interest Held in A | Applicant: |
| (refer to Instructions for list) | | | or list of codes): | , | 17 |
| I | M | | | 40 | |
| 8) Disc&able Interest Holder's Type of Ownership | • | | 9) Disclosable Interest F | Idder's Country of Citizenship: | |
| (refer to instructions for list): | | | | | |
| L | | | USA | | |
| 10)-Relationship Description (if the discloseable interest | est holder is | an indirect ow | | rom indirect owner to the applican | t): |
| | | | | | |
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| | | | | | |
| Related FCC Regulated Businesses of Disc | losable Ir | nterest Holo | lers (repeat for each | interest holder identified) | |
| IIa) Name and address of all FCC Regulated Busine | eses. | Dr | IIb) incipal Business: | IIc) TIN: | IId) Percent of |
| owned by Disclosable Interest Holder listed in #3 | | , , | пораг Визпессо. | 1114. | Interest Held: |
| additional sheets, if necessary): | | | | | |
| Cirrus Communications, Ltd | d. | | | | |
| | | LMDS | | <u> </u> | 4 0 |
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FCC Ownership Disclosure information for the Wireless Telecommunications Services

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Schedule for Disclosable Interest Holders

| Disclosable interest Holder Information (complete as | many as re | equired to describe all dis | sclosable interest holders) | | |
|---|--------------|-----------------------------|---|------------|--|
| 1) Disclosable Interest Hdder's First Name (if individual): | MI: | Last Name: | | suffix: | |
| Paul | F | Burdett | Burdett | | |
| 2) Disclosable Interest Holder's Name (if entity): | | | 3) Disclosable Interest Holder's | TIN: | |
| | | | | | |
| c/o Severn LMDS LLC | | | | | |
| 4) Disclosable Interest Holder's Address: | | , | | | |
| | | | | I | |
| 705 Melvin Avenue, Suite 202, A | \nnapol | is, MD 21401 | | I | |
| , ,, | | Hdder is a(n): () | 7) Percent of Interest Held in Applicant: | | |
| (refer to Instructions fof list) (refer to | IIISUUCUOIIS | for list of codes): | | | |
| - | | | 12.2 | | |
| I | | | 13.3 | | |
| 8) Disc&able Interest Holder's Type of Ownership | | 9) Disclosable Interest Ho | older's Country of Citizenship: | | |
| (refer to instructions fcf list): | | | | | |
| | | | | | |
| L | | USA | | | |
| 10) Relationship Description (if the discloseable interest hdder is | | | | : | |
| Mr. Burdett holds a 13.3 percer | | _ | - | | |
| Communications, Ltd. indirectly | , throu | ıgh his ownersh | ip of 33.3% of S | Severn | |
| LMDS LLC, a 40% limited partner | : in Ci | irrus Communica | tions, Ltd. | | |
| | | | | | |
| Related FCC Regulated Businesses of Disclosable in | nterest Hol | lders (repeat for each in | terest holder identified) | | |
| lla) | | IIb) | IIc) | lld) | |
| Name and address of all FCC Regulated Businesses | F | Principal Business: | TIN: | Percent of | |

| Theialeu I CC Negulaleu Dusillesses of Disclosable i | The control of the co | 1 | |
|---|--|--------------|--------------------------------|
| IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): | IIb) Principal Business: | IIc) TIN: | IId) Percent of Interest Held: |
| Cirrus Communications, Ltd. | | | |
| | LMDS | <u> </u> | 13.3 |
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Schedule for Disclosable Interest Holders

Disclosable Interest Holder information (complete as many as required to describe all disclosable interest holders)

| Disclceable Interest Holder's First Name (ii individual): Ml: | | Last Name: | | Suffix: | |
|--|-------|--|---------------------------------------|---------|--|
| Thomas | L | Siebert | | | |
| 2) Disclceable Interest Holder's Name (if entity): | | | 3) Disclosable Interest Holder's TIN: | | |
| c/o Severn LMDS LLC | | | | | |
| 4) Disclosable Interest Holder's Address: | | | | | |
| 705 Melvin Avenue, Suite 202, Annapolis, MD 21401 | | | | | |
| -/ / / / / / / / / / / / / / / / / / / | | terest Holder is a(n): () 7) Percent of Interest Held in Applicant: uctions for list of codes): | | | |
| | | | | | |
| I | | | 13.3 | | |
| 8) Discleeable Interest Holder's Type of Ownership | | 9) Disclosable Interest Ho | older's Country of Citizenship: | | |
| (refer to instructions for list): | | | | | |
| L USA | | | | | |
| 10)—Relationship Description (if the discloseable interest holder is an in | | | | | |
| Mr. Siebert holds a 13.3 percent interest in the applicant, Cirrus | | | | | |
| Communications, Ltd. indirectly through his ownership of 33.3% of Severn | | | | | |
| LMDS LLC, a 40% limited partner i | in Ci | rrus Communica | ations, Ltd. | | |
| | | | | | |

Related FCC Regulated Businesses of Disclosable interest Holders (repeat for each interest holder identified)

| IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary): | IIb) Principal Business: | IIc) TIN: | IId) Percent of Interest Held: |
|--|-----------------------------|--------------|--------------------------------|
| Cirrus Communications, Ltd. | | | |
| | LMDS | | 13.3 |
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Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

| 1) Disclosable Interest Holder's First Name (if individual): | MI: | Last Name: | | Suffix: | |
|--|-------|---|---------------------------------------|--------------|--|
| Craig | L | Siebert | | | |
| 2) Disclosable Interest Holder's Name (if entity): | • | | 3) Disclosable Interest Holder's TIN: | | |
| c/o Severn LMDS LLC | | | ; | | |
| 4) Disclosable Interest Holder's Address: | | | | | |
| 705 Melvin Avenue, Suite 202, Annapolis, MD 21401 | | | | | |
| , ,, | | Holder is a(n): (7) Percent of Interest Held in Applicant: for list of codes): | | ant: | |
| (************************************** | | , | | | |
| I | | | 13.3 | | |
| Disclosable Interest Holder's Type of Ownership (refer to instructions for list): | | 9) Disclosable Interest Ho | older's Country of Citizenship: | | |
| (refer to instructions for list). | | | | | |
| L USA | | | | | |
| 10) Relationship Description (if the discloseable interest hdder is an indirect owner, list path of ownership from indirect owner to the applicant): | | | | | |
| Mr. Siebert holds a 13.3 percent | | _ | - | | |
| · | _ | | - | <i>r</i> ern | |
| LMDS LLC, a 40% limited partner i | n Cir | rrus Communica | tions, Ltd. | | |
| Communications, Ltd. indirectly t LMDS LLC, a 40% limited partner i | _ | | - | vern | |

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

| Related FCC Regulated Businesses of Disclosable II | of Disclosable Interest Holders (repeat for each interest holder identified) | | | | | |
|--|--|--------------|--------------------------------|--|--|--|
| IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets. if necessary): | IIb) Principal Business: | IIc) TIN: | IId) Percent of Interest Held: | | | |
| Cirrus Communications, Ltd. | | | | | | |
| | LMDS | | 13.3 | | | |
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